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 11 *Attorneys for Defendants*
Pacific West Management, LLC and
William D. Pennington

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 CRYSTAL BUCHSPICS,
 15 Plaintiff,
 vs.
 16 PACIFIC WEST MANAGEMENT, LLC AND
 WILLIAM D. PENNINGTON,
 Defendants.

17 Case No. 3:24-cv-00095-CSD

18 **STIPULATION AND ORDER TO
 19 EXTEND TIME FOR DEFENDANTS TO
 FILE A RESPONSE TO PLAINTIFF'S
 20 COMPLAINT
 (FIRST REQUEST)**

21 Defendants Pacific West Management, LLC and William D. Pennington, by and through
 22 their counsel, the law firm of Jackson Lewis P.C., and Plaintiff Crystal Buchspics, by and through
 23 her counsel, the Law Office of Mark Mausert, hereby stipulate and agree to extend the deadline for
 24 Defendants to file their respective responses to Plaintiff's Complaint to **April 12, 2024**. This
 25 Stipulation is submitted and based upon the following:

26 1. On February 27, 2024, Plaintiff filed a Complaint naming Pacific West
 27 Management, LLC and William D. Pennington as Defendants.

28 2. On March 1, 2024, Plaintiff served Pacific West Management, LLC with a copy of
 the Summons and Complaint. The deadline for Pacific West Management, LLC to respond to
 Plaintiff's Complaint is March 22, 2024.

29 3. On March 15, 2024, Plaintiff served Mr. Pennington with a copy of the Summons
 and Complaint. The deadline for Mr. Pennington to respond to Plaintiff's Complaint is April 5, 2024.

1 4. Defense counsel was recently retained and requires sufficient time to investigate
2 Plaintiff's allegations and prepare Defendants' respective responses.

3 5. In addition, because Defendants were served on different dates, the parties wish to
4 synchronize Defendants' response deadlines for more efficient case management.

5 6. This is the first request for an extension of time for Defendants to file a response to
6 Plaintiff's Complaint. The parties agree to extend the deadline for both Defendants to file a response
7 to Plaintiff's Complaint to **April 12, 2024**.

8 7. This request is made in good faith and not for the purpose of delay.

9 8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair
10 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation
11 and Order shall be construed as an admission of or consent to the merit or validity of any claim,
12 defense, objection, or right by any party in this case.

13 DATED this 22nd day of March, 2024.

14 LAW OFFICE OF MARK MAUSERT

15 */s/ Mark Mausert*
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17 Nevada Bar No. 2398
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22 *Attorneys for Defendants*

23 **ORDER**

24 IT IS SO ORDERED:

25 
26 UNITED STATES MAGISTRATE JUDGE

27 Dated: March 22, 2024